

Honorable Judge Benjamin Settle

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

CLYDE RAY SPENCER,

Plaintiff,

v.

DETECTIVE SHARON KRAUSE, and
SERGEANT MICHAEL DAVIDSON,

Defendants.

No. C11-5424BHS

**DECLARATION OF
KATHLEEN T. ZELLNER IN
SUPPORT OF REPLY IN
SUPPORT OF PLAINTIFF'S
MOTION FOR LEAVE TO
TAKE TRIAL DEPOSITIONS
OF MENONA LANDRUM AND
ANN LINK, Ph.D.**

Pursuant to 28 U.S.C. § 1746, Kathleen T. Zellner declares under penalty of perjury under the laws of the State of Washington and the United States of America that the following is true and accurate:

1) I am the attorney of record for Plaintiff Clyde Ray Spencer in the above entitled action. I am competent to testify in all respects, and make this declaration from personal knowledge.

2) Attached to this Declaration as Exhibit A is an email, dated October 8, sent by my office to opposing counsel regarding the proposed trial deposition of Dr. Link.

DECLARATION OF KATHLEEN T. ZELLNER IN SUPPORT
OF PLAINTIFF'S REPLY IN SUPPORT OF MOTION FOR
LEAVE TO TAKE TRIAL DEPOSITION (C11-5424BHS) — 1

Kathleen T. Zellner & Associates, P.C.
LAW OFFICES
1901 Butterfield Road
Suite 650
Downers Grove, Illinois 60515
630.955.1212 main • 630.955.1111 fax

1 3) Attached to this Declaration as Exhibit B is an email, dated October 9, sent by
2 counsel for Defendant Krause, Guy Bogdanovich, regarding the proposed trial deposition of
3 Dr. Link.

4 4) Attached to this Declaration as Exhibit C is an email, dated October 9, sent by
5 counsel for Defendant Davidson, Jeff Freimund, regarding the proposed trial deposition of Dr.
6 Link.

7 5) Attached to this Declaration as Exhibit D is an email, dated October 24, sent by
8 my office to opposing counsel regarding the proposed trial deposition of Menona Landrum.
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10 6) Attached to this Declaration as Exhibit E is an email, dated October 29, sent by
11 counsel for Defendant Krause, Guy Bogdanovich, regarding the proposed trial deposition of
12 Menona Landrum.

13 7) Attached to this Declaration as Exhibit F is a true and correct redacted copy of
14 the Clark County District Court Docket in Case No. 205066D CKP.
15

16 SIGNED this 20th day of November, 2013 in Downers Grove, Illinois.

17 Respectfully submitted,
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19

20 /s/ Kathleen T. Zellner
21 Kathleen T. Zellner & Associates, P.C.
22 Admitted *pro hac vice*
23 1901 Butterfield Road
24 Suite 650
25 Downers Grove, Illinois 60515
26 Phone: (630) 955-1212
27 Fax: (630) 955-1111
kathleen.zellner@gmail.com
Attorney for Plaintiffs

DECLARATION OF SERVICE

I hereby certify that on November 20, 2013, I caused the foregoing to be electronically filed with the Clerk of the Court using the CM/ECF System, which will send notification of such filing to the attorneys of record as follows:

Guy Bogdanovich Law, Lyman, Daniel, Kamerrer & Bogdanovich, P.S. P.O. Box 11880 Olympia, WA 98508-1880 Email: gbogdanovich@lldkb.com Attorney for Defendant Sharon Krause	Jeffrey A. O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98502 Email: jeff@fjtlaw.com Attorneys for Defendant Michael Davidson
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/s/ Kathleen T. Zellner

Kathleen T. Zellner & Associates, P.C.

Admitted *pro hac vice*

1901 Butterfield Road

Suite 650

Downers Grove, Illinois 60515

Phone: (630) 955-1212

Fax: (630) 955-1111

kathleen.zellner@gmail.com

Attorney for Plaintiffs